

# Exhibit 1

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*Lead Counsel for the  
Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

Case No. 3:07-cv-5944  
MDL No. 1917

**CLASS ACTION**

This Document Relates to:  
All Indirect Purchaser Actions

**DECLARATION OF MARIO N. ALIOTO IN  
SUPPORT OF INDIRECT PURCHASER  
PLAINTIFFS' MOTION FOR ATTORNEYS'  
FEES, REIMBURSEMENT OF EXPENSES  
AND INCENTIVE AWARDS TO CLASS  
REPRESENTATIVES**

Judge: Honorable Samuel Conti  
Courtroom One, 17th Floor

**DECLARATION OF MARIO N. ALIOTO IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION  
FOR ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES AND INCENTIVE AWARDS TO CLASS  
REPRESENTATIVES**

Case No. 3:07-cv-5944, MDL No. 1917

1 I, Mario N. Alioto, declare as follows:

2 1. I am an attorney licensed to practice before the courts of the State of California, and  
3 a partner in the law firm Trump, Alioto, Trump & Prescott, LLP. I have personal knowledge of  
4 the facts stated in this declaration and, if called as a witness, I could and would testify competently  
5 to them. I make this declaration in support of my firm's request for attorneys' fees and  
6 reimbursement of litigation expenses, as set forth in Indirect Purchaser Plaintiffs' Motion for  
7 Attorneys' Fees, Reimbursement of Litigation Expenses and Incentive Awards to Class  
8 Representatives.

9 2. My firm is the Court-appointed Lead Counsel for the Indirect Purchaser Plaintiffs  
10 ("IPPs") in this case, and represents named plaintiff Jeffrey Figone. A brief description of the  
11 main lawyers in my firm who participated in this case is attached as Exhibit 1 and incorporated  
12 herein by reference.

13 3. Throughout the course of this litigation, my firm kept files contemporaneously  
14 documenting all time spent, including tasks performed, and expenses incurred. All of the time and  
15 expenses reported by my firm were incurred for the benefit of the IPPs.

16 4. I and members of my firm have been involved in every aspect of this litigation  
17 since its inception. I, or members of my firm, did much of the substantive work in this litigation  
18 and personally oversaw and directed all of the work performed by other IPP Counsel. All of this  
19 work is described in detail in the Master Declaration of Mario N. Alioto In Support of Indirect  
20 Purchaser Plaintiffs' Motion for Attorneys' Fees, Reimbursement of Litigation Expenses and  
21 Incentive Awards, which is filed herewith and is incorporated herein by reference.

22 5. The schedule attached as Exhibit 2, and incorporated herein, is a detailed summary  
23 of the amount of time spent by my firm's partners, attorneys and professional support staff who  
24 were involved in this litigation. It does not include any time devoted to preparing this declaration  
25 or otherwise pertaining to the Joint Fee Petition. The lodestar calculation is based on my firm's  
26 historical billing rates in effect at the time services were performed. Exhibit 2 was prepared from  
27 contemporaneous time records regularly prepared and maintained by my firm. The hourly rates

1 for my firm's partners, attorneys and professional support staff included in Exhibit 2 were at the  
2 time the work was performed the usual and customary hourly rates charged for their services in  
3 similar complex litigation. My rates are below market rates charged by attorneys of my experience  
4 and background for similar work. Based upon my extensive review of the rates charged by  
5 attorneys of my experience and background for similar work, my historical rates for the period  
6 2007-2015 should be: \$750, \$800, \$850, \$850, \$900, \$875, \$875, \$875 and \$875, respectively.

7 6. The total number of hours reasonably expended on this litigation by my firm from  
8 inception to September 15, 2015 is 30,611.20 hours. The total lodestar for my firm at historical  
9 rates is \$15,745,591.25. The total lodestar for my firm at current rates is \$17,290,782.50. Expense  
10 items are billed separately and are not duplicated in my firm's lodestar.

11 7. The expenses my firm incurred in litigating this action are reflected in the books  
12 and records of my firm. These books and records are prepared from expense vouchers, invoices,  
13 receipts, check records and other source materials and accurately reflect the expenses incurred.  
14 My firm's expense records are available for inspection by the Court if necessary.

15 8. My firm incurred a total of \$1,285,597.45 in unreimbursed expenses, all of which  
16 were reasonable and necessary for the prosecution of this litigation. Of this amount, \$1,260,000  
17 was for assessment payments for common litigation expenses, and an additional \$25,597.45 was  
18 for non-common litigation expenses incurred by my firm, such as travel, meals and lodging,  
19 copying, legal research, and telephone. A summary of those expenses by category is attached as  
20 Exhibit 3.

21  
22 I declare under penalty of perjury that the foregoing is true and correct. Executed this 22nd  
23 day of September, 2015, in San Francisco, California.

24  
25 /s/ Mario N. Alioto

26 Mario N. Alioto  
27  
28

# EXHIBIT 1

MARIO N. ALIOTO

*Curriculum Vitae*

Mr. Alioto is a graduate of the University of Santa Clara with a B.A. degree, cum laude, in Economics. He is also a graduate of the University of San Francisco School of Law with a J.D. degree, cum laude.

Upon graduation from law school, Mr. Alioto clerked for the late Honorable Ira I. Brown, Jr., Judge of the San Francisco Superior Court. Thereafter, he was employed in the Law Offices of Joseph L. Alioto working on complex litigation, primarily plaintiff's antitrust cases. Mr. Alioto is admitted to the State Bar of California, various Federal District Courts, various Courts of Appeal, and the Supreme Court of the United States.

Mr. Alioto worked with the Law Offices of Joseph L. Alioto for 10 years. He has continued to handle complex litigation and antitrust cases as well as unfair competition and consumer protection cases and class actions in state and federal courts throughout the country. Mr. Alioto has represented both plaintiffs and defendants in these cases. He has had extensive trial court and appellate court experience as well as experience in arbitration proceedings.

Mr. Alioto was one of the first lawyers in California to successfully prosecute indirect purchaser antitrust class actions under the Cartwright Act and the Unfair Competition Act. He was counsel in the landmark decision Crown Oil v. Superior Court, 177 Cal. App. 3d 604 (1986), which upheld the right of indirect purchasers to sue under the Cartwright Act after their claims had been barred under federal law by the decision in Illinois Brick v. Illinois, 431 U.S. 720 (1977). As a result of the Crown Oil decision, California consumers and businesses have recovered millions of dollars in relief which would otherwise have been barred under Illinois Brick.

In over 30 years of practice in this area, Mr. Alioto has handled approximately 50 antitrust cases. He has served in leadership roles in most of these cases and has been Lead or Liaison Counsel in many of them. This experience has enabled Mr. Alioto to prosecute these cases efficiently and

achieve favorable settlements without unnecessary demands on judicial resources.

Mr. Alioto has handled these cases in collaboration with other law firms when circumstances warranted this, and has also demonstrated the ability to handle these cases effectively without the assistance of a consortium of other law firms. Mr. Alioto has been involved in a number of jury trials in state and federal court, including the trial of antitrust cases as the lead trial lawyer. He has handled approximately 30 appeals as well.

Mr. Alioto obtained relief of approximately \$50 million for California consumers on account of improper automobile repossession practices by two large finance companies. This result was obtained primarily by Mr. Alioto and his firm Trump, Alioto, Trump & Prescott, LLP, with the assistance of one other firm. In approving the settlement in that matter, the Honorable Daniel M. Hanlon (Ret.) noted that Trump, Alioto, Trump & Prescott, LLP had handled the litigation “effectively and efficiently” and that counsel was “experienced and competent” and had obtained an “excellent settlement.”

Similarly, in granting class certification and appointing Trump, Alioto, Trump & Prescott, LLP Co-Lead Counsel for the class in the indirect purchaser OSB Antitrust Litigation, Case No. 06-00826-PSD, Judge Paul S. Diamond of the Eastern District of Pennsylvania stated that Trump, Alioto, Trump & Prescott, LLP “are experienced, class action litigators” and “have vigorously and capably prosecuted this extremely demanding case, and I am satisfied that they will continue to do so.”

Mr. Alioto was also selected to serve as sole interim lead counsel for the indirect purchaser plaintiffs by the Honorable Samuel Conti of the United States District Court of the Northern District of California in *In re Cathode Ray Tube (CRT) Antitrust Litigation*, 2008 WL 2024957, \*2 (N.D. Cal. May 9, 2008) (“CRT”).

Most recently, Mr. Alioto was selected by the Honorable Robert W. Gettleman of the United States District Court for the Northern District of Illinois to serve as interim co-lead counsel for the indirect purchaser plaintiffs in *In Re: Aftermarket Filters Antitrust Litigation*, Master File No. 1:08-cv-4883-RWG, MDL 1957 (N.D. Ill. Oct. 7, 2008) (“Filters”).

Below is a list of representative complex litigation cases Mr. Alioto has been and is currently involved in.

**COMPLEX LITIGATION CASES**

- 1) *In re Arizona Dairy Products Litigation*, Civil No. 74-569A PHX CAM (D. Ariz.) - antitrust price-fixing action brought on behalf of five classes of Arizona purchasers of dairy products.
- 2) *In re California Armored Cars Litigation*, MDL 387 - antitrust price-fixing action brought on behalf of private class of purchasers in California.
- 3) *Bolton v. A.R.A. Services, Inc., et al.*, Civil Action No. C-79-2156-SW (N.D. Cal. 1980), antitrust price-fixing action brought on behalf of purchasers of publications.
- 4) *Day N Night Market v. Roblin Industries, Inc., et al.*, Civil Action No. 772-241 - antitrust price-fixing case for class of indirect purchasers of shopping carts.
- 5) *Monterosso v. Cambridge-Lee Industries, Inc., et al.*, (S.F. Sup. Ct. 1983) - indirect-purchaser, antitrust class action by California purchasers of copper tubing.
- 6) *Scarpa v. American Savings & Loan Association, et al.*, (S.F. Sup. Ct. 1984) - Unfair Competition Act for fixing pre-payment and association fees.
- 7) *California Indirect-Purchaser Infant Formula Antitrust Litigation*, Judicial Council Coordination Proceeding No. 2557 (L.A. Sup. Ct.) - state-wide, Cartwright Act, class action for consumers who purchased infant formula.
- 8) *Airport Hub Antitrust Litigation* (N.D. Ga.) - nationwide class action for price-fixing of domestic airline ticket prices.
- 9) *Duke Development Company v. The Stanley Works, et al.* (S.F. Sup. Ct.) - state-wide, price-fixing, Cartwright Act, class action for indirect purchasers of hinges.
- 10) *Exxon Valdez Spill Litigation* (L.A. Sup. Ct.) state-wide class action for economic damages suffered by California motorists caused by Exxon Valdez spill.
- 11) *Los Angeles Waste Antitrust Litigation* (C.D. Cal.) - county-wide, price-fixing, Cartwright Act class action involving waste disposal.



- 12) *Leslie K. Bruce, et al. v. Gerber Products Company, et al.*, Civil Case No. 948-857 (S.F. Sup. Ct.) - indirect-purchaser, price-fixing action against baby food manufacturers.
- 13) *Nancy Wolf v. Toyota Motor Sales, U.S.A., Inc., et al.*, Civil Action No. C94-1359-MHP - nationwide, consumer class action alleging that the TDA Assessment on the dealer invoice was raised pursuant to an antitrust agreement.
- 14) *Lee Bright v. Kanzaki Specialty Papers, Inc., et al.*, Civil Action No. 963-598 (S.F. Sup. Ct.) - indirect-purchaser, consumer class action alleging a price-fixing conspiracy on fax paper.
- 15) *Patco Enterprises v. Comet Products, Inc., et al.*, Civil Action No. 961-814 (S.F. Super Ct.) - indirect-purchaser, class action alleging a price-fixing conspiracy on plastic dinnerware.
- 16) *In re California X-Ray Antitrust Litigation*, Civil Action No. 960-886 (S.F. Sup. Ct.) - indirect-purchaser, class action alleging price-fixing in X-ray film.
- 17) *In Re Brand Name Prescription Drugs Antitrust Litigation*, Civil Action No. 94-C-897, MDL 997 (U.S. District Court - Northern District of Illinois, Eastern Division) - direct-purchaser class action alleging that the prescription drug manufacturers and wholesalers combined to keep prices unreasonably high to retail pharmacies.
- 18) *In Re: Liquid Carbon Dioxide Cases*, Judicial Council Coordination Proceeding No. 3012 (San Diego Sup. Ct.) - indirect-purchaser class action alleging price-fixing on carbon dioxide.
- 19) *Jack Davis v. Microsoft Corporation*, Civil Action No. 963-597 (S.F. Sup. Ct.) - consumer class action alleging that Microsoft's 6.0 system was flawed and should be corrected.
- 20) *In Re Sorbate Price-Fixing Cases*; JCCP 4073 - class action alleging that certain manufacturers of sorbate fixed prices for product sold indirectly to California purchasers.
- 21) *In Re Methionine Antitrust Litigation*, MDL 1311--class action alleging that certain manufacturers of methionine fixed prices to direct purchasers throughout the United States.
- 22) *In Re Methionine Cases*, JCCP 4090 - class action alleging that certain manufacturers of methionine fixed prices to indirect purchasers of that product in California

- 23) *Patco Enterprises, Inc., et al. v. Sunrise Carpet Industries, et al.*, SF Sup. Ct. Action No. 980454 - class action alleging that manufacturers of certain types of carpets fixed prices to indirect purchasers in California.
- 24) *Sanitary Paper Cases I & II*, JCCP 4019, 4027] - class action alleging that manufacturers of certain types of sanitary paper fixed prices to indirect purchasers in California.
- 25) *In re: Flat Glass Indirect Purchaser Antitrust Litigation*, JCCP 4033 - class action alleging that manufacturers of certain types of flat glass fixed prices to indirect purchasers in California.
- 26) *NASDAQ Market Makers Antitrust Litigation*, MDL 1023 94 Civ. 3996 (RWS) - nationwide class action alleging that stock trading commissions were illegally fixed.
- 27) *In re Vitamin Antitrust Litigation*, JCCP 4076 - statewide class action by indirect purchasers alleging a price-fixing conspiracy.
- 28) *In re Auctions House Antitrust Litigation*, JCCP 4145 - indirect-purchaser antitrust class action alleging that major auction houses fixed buyer commissions.
- 29) *In re Cigarette Price-Fixing Cases*, JCCP 4114 - California Cartwright Act class action alleging that the tobacco companies fixed prices of cigarettes to pay state settlements.
- 30) *In re Compact Disc Minimum Advertised Price Antitrust Litigation*, United States District Court, District of Maine, MDL No. 1361—class action alleging price fixing on music compact discs.
- 31) *In re Laminate Cases*, Alameda Superior Court, Master File No. 304471—indirect purchaser class action alleging price fixing on high pressure laminates.
- 32) *Swiss American Sausage Co. v. Pfizer, Inc.*, San Francisco Superior Court, No. 305121—indirect purchaser class action alleging price fixing on sodium erythorbate and maltol.
- 33) *Blair v. Cheil Jedang*, San Francisco Superior Court—indirect purchaser class action alleging price fixing on lysine.
- 34) *Automobile Repossession Cases*, San Francisco Superior Court—indirect purchaser class action alleging price fixing on automobile repossession services.

- 35) *Lapidus v. Crown Oil*, San Francisco Superior Court, indirect purchaser class action alleging price fixing on coconut oil.
- 36) *Behr Wood Sealant Cases*, San Joachin Superior Court—indirect purchaser class action alleging defective wood sealant products.
- 37) *Food Additives Cases*, Stanislaus Superior Court, JCCP 3261—indirect purchaser class action alleging price fixing on high fructose corn syrup.
- 38) *In re Liquid Asphalt*, United States District Court for the District of Montana—direct purchaser action alleging price fixing on liquid asphalt.
- 39) *Panel Roofing*, Los Angeles Superior Court—class action alleging price fixing on panel roofing in the Los Angeles area.
- 40) *Checking Account Cases*, San Francisco Superior Court—alleging unlawful termination of free checking accounts.
- 41) *Campbell v. Fireside Thrift*, San Francisco Superior Court, No. 316462—alleging unlawful automobile repossession practices.
- 42) *Groom v. Ford Motor Credit*, San Francisco Superior Court, JCCP 4281—alleging unlawful automobile repossession practices.
- 43) *Cipro Cases*, San Diego Superior Court, JCCP 4154 and 4220—alleging unlawful agreement to eliminate generic Cipro from the market.
- 44) *Labelstock Cases*, San Francisco Superior Court, JCCP 4314, 4318 and 4326—indirect purchaser class action alleging price fixing on pressure sensitive labels.
- 45) *Credit/Debit Card Tying Cases*, San Francisco Superior Court, JCCP 4335—alleging unlawful tying of debit cards to credit cards.
- 46) *Gustin Schreiner v. Crompton Corporation*, San Francisco Superior Court, No. CGC-04-429323—indirect purchaser class action alleging price fixing of NBR.
- 47) *Electrical Carbon Products Cases*, San Francisco Superior Court, JCCP 4294—indirect purchaser class action alleging price fixing on electrical carbon products.
- 48) *Polyester Staple Cases*, San Francisco Superior Court, JCCP 4278—indirect purchaser class action alleging price fixing on polyester staple.

- 49) *D-RAM Cases*, San Francisco Superior Court, JCCP 4265—indirect purchaser class action alleging price fixing on D-RAM.
- 50) *Environmental Technologies Cases*, Alameda Superior Court, JCCP 4257—indirect purchaser class action alleging price fixing on organic peroxide.
- 51) *Reidel v. Norfalco LLC*, San Francisco Superior Court, No. CGC-03-418080—indirect purchaser class action alleging price fixing of sulfuric acid.
- 52) *Villa v. Crompton Corporation*, San Francisco Superior Court, No. CGC-03-419116—indirect purchaser class action alleging price fixing of EPDM.
- 53) *Carbon Black Cases*, San Francisco Superior Court, JCCP 4323—indirect purchaser class action alleging price fixing of Carbon Black.
- 54) *Urethane Cases*, San Francisco Superior Court, JCCP 4367 -indirect purchaser class action alleging price fixing of urethane.
- 55) *Catfish Products Cases*, San Francisco Superior Court—indirect purchaser class action alleging price fixing of catfish products.
- 56) *Fattal v. Noranda*, United States District Court for the District of New Mexico—alleging worldwide price fixing of potash.
- 57) *In re Corn Derivatives*, United States District Court for the District of New Jersey—alleging nationwide price fixing of corn derivatives.
- 58) *In Re: California Polychloroprene Antitrust Cases*, Los Angeles Superior Court, JCCP 4376—indirect purchaser class action alleging price fixing of Polychloroprene rubber.
- 59) *Microsoft Cases I-V*, San Francisco Superior Court, JCCP 4106—indirect purchaser class action alleging monopolization by Microsoft.
- 60) *California Indirect Purchaser MSG Antitrust Cases*, San Francisco Superior Court, Master File No. 304471—indirect purchaser class action alleging price fixing of monosodium glutamate (MSG).
- 61) *In re Dynamic Random Access Memory (DRAM) Antitrust Litigation*, United States District Court for the Northern District of California, MDL 1486—indirect purchaser multistate class action alleging price fixing of DRAM memory chips.

- 62) *In re: Urethane Antitrust Litigation*, United States District Court for the District of Kansas, MDL 1616—direct purchaser class action alleging price fixing of urethane chemicals.
- 63) *Brock v. Stolt Nielsen S.A. et al.*, San Francisco Superior Court, Case No. 429758—indirect purchaser class action alleging price fixing of shipping services.
- 64) *The Harman Press v. International Paper Co., et al.*, San Francisco Superior Court, Master File No. 432167—indirect purchaser class action alleging price fixing of publication paper.
- 65) *In re: Publication Paper Antitrust Litigation*, United States District Court for the District of Connecticut, MDL 1631—direct purchaser class action alleging price fixing of publication paper.
- 66) *In re: Hydrogen Peroxide Antitrust Litigation*, United States District Court for the Eastern District of Pennsylvania, Master File No. 2:05-cv-00666—indirect purchaser multistate class action alleging price fixing of hydrogen peroxide.
- 67) *In re OSB Antitrust Litigation*, United States District Court for the Eastern District of Pennsylvania, Master File No. 06-cv-00826—indirect purchaser multistate class action alleging price fixing of OSB.
- 68) *In re: Methyl Methacrylate (MMA) Antitrust Litigation*, United States District Court for the Eastern District of Pennsylvania, MDL 1768—indirect purchaser multistate class action alleging price fixing of Methyl Methacrylate (MMA).
- 69) *Miller, et al. v. Ajinomoto Company, Inc., et al.*, United States District Court for the Eastern District of Pennsylvania, Master File No. 2:06-cv-01862—indirect purchaser multistate class action alleging price fixing of Aspartame.
- 70) *Brooks, et al. v. Outokumpu Oyj, et al.*, United States District Court for the Western District of Tennessee, Master File No. 2:06-cv-02355—indirect purchaser multistate class action alleging price fixing of ACR Copper Tubing.
- 71) *In re Intel Corp. Microprocessor Antitrust Litigation*, United States District Court for the District of Delaware, MDL 1717—indirect purchaser multistate class action alleging monopolization by Intel of the United States microprocessor market.

- 72) *In re International Air Transportation Surcharge Antitrust Litigation*, United States District Court for the Northern District of California, MDL 1793—direct purchaser class action alleging price fixing of airline fuel surcharges on international flights.
- 73) *In re Static Random Access Memory (SRAM) Antitrust Litigation*, United States District Court for the Northern District of California, MDL 1819—indirect purchaser multistate class action alleging price fixing of SRAM memory chips.
- 74) *In re Graphics Processing Units Antitrust Litigation*, United States District Court for the Northern District of California, MDL 1826—direct purchaser class action alleging price fixing of Graphics Processing Units.
- 75) *In re: TFT-LCD (Flat Panel) Antitrust Litigation*, United States District Court for the Northern District of California, MDL 1827—direct purchaser class action alleging price fixing of TFT-LCDs or flat panels.
- 76) *In re Korean Airlines Passenger Antitrust Litigation*, United States District Court for the Central District of California, MDL 1891—direct purchaser class action alleging price fixing of passenger airline tickets on flights between the United States and South Korea.
- 77) *In re: LTL Shipping Antitrust Litigation*, United States District Court for the Northern District of Georgia, MDL 1895—indirect purchaser multistate class action alleging price fixing of fuel surcharges on “less than truckload” freight services.
- 78) *In re: Transpacific Passenger Air Transportation Antitrust Litigation*, MDL No. 1913—direct purchaser class action alleging price fixing of passenger airline tickets on flights containing at least one transpacific flight segment to or from the United States.
- 79) *In Re: Cathode Ray Tubes (CRT) Antitrust Litigation*, United States District Court for the Northern District of California, MDL No. 1917—indirect purchaser class action alleging price fixing of cathode ray tubes (CRTs) and products containing CRTs sold in the United States.
- 80) *In Re: Chocolate Confectionary Antitrust Litigation*, United States District Court for the Western District of Pennsylvania, MDL No. 1935—indirect purchaser class action alleging price fixing of chocolate confectionary products sold in the United States.
- 81) *In Re: Packaged Ice Antitrust Litigation*, United States District Court for the Eastern District of Michigan, MDL No. 1952—direct purchaser class action alleging price fixing of Packaged Ice sold in the United States.

- 82) *In Re: Aftermarket Filters Antitrust Litigation*, United States District Court for the Eastern District of Michigan, MDL 1957—indirect purchaser class action alleging price fixing of aftermarket automotive filters sold in the United States.
- 83) *In Re: Hawaiian and Guamanian Cabotage Antitrust Litigation*, United States District Court for the Western District of Washington, MDL No. 1972—direct purchaser class action alleging price fixing of domestic shipping services between the United States and Hawaii.
- 84) *In Re: Refrigerant Compressors Antitrust Litigation*, United States District Court for the Eastern District of Michigan, MDL No. 2042—indirect purchaser class action alleging price fixing of Hermetic Compressors sold in the United States.

**JOSEPH MARIO PATANE**  
*Curriculum Vitae*

Born San Francisco, California, February 20, 1950.

Education: BA San Francisco State University, 1973; University of San Francisco School of Law 1976; LLM Taxation, Golden Gate University School of Law 1981.

Legal Experience: Associate Trump, Kouba & Dickson, 1977-1982; Law Office of Joseph M. Patane 1982; Presently Of Counsel to Trump, Alioto, Trump & Prescott LLP.

Below is a list of representative complex litigation cases Mr. Patane has been and is currently involved in.

**COMPLEX LITIGATION CASES**



**Complex Litigation Cases**

1. **In re California Armored Cars Litigation**, MDL 387-antitrust price-fixing action brought on behalf of private class of purchasers in California.
2. **Bolton v. A.R.A. Services, Inc., et al.**, Civil Action No. C-79-2156-SW (N.D. Cal. 1980), antitrust price-fixing action brought on behalf of purchasers of publications.
3. **Day N Night Market v. Robin Industries, Inc., et al.**, Civil Action No. 772-241-antitrust price-fixing case for class of indirect purchasers of shopping carts.
4. **Monterosso v. Cambridge-Lee Industries, Inc., et al.**, (S.F. Sup. Ct. 1983)-indirect-purchaser, antitrust class action by California purchasers of copper tubing.
5. **Duke Development Company v. The Stanley Works, et al.** (S. F. Sup Ct.)-statewide, price-fixing, Cartwright Act, class action for indirect purchasers of hinges.
6. **Nancy Wolf v. Toyota Motor Sales. U.S.A., Inc., et al.**, Civil Action No. C94-1359-MHP-nationwide, consumer class action alleging that the TDA Assessment on the dealer invoice was raised pursuant to an antitrust agreement.
7. **Lee Bright v. Kanzaki Specialty Papers, Inc., et al.**, Civil Action No. 963-598 (S.F. Sup. Ct.)-indirect-purchaser, consumer class action alleging a price-fixing conspiracy on fax paper.
8. **Patco Enterprises v. Comet Products, Inc., et al.**, Civil Action No. 961-814 (S.F. Super Ct.)-indirect-purchaser, class action alleging a price-fixing conspiracy on plastic dinnerware.
9. **In Re: Liquid Carbon Dioxide Cases**, Judicial Council Coordination Proceeding No. 3012 (San Diego Sup. Ct.)-indirect-purchaser class action alleging price-fixing on Carbon Dioxide.
10. **In Re: Sorbate Price-Fixing Cases**, JCCP 4073-class action alleging that certain manufacturers of sorbate fixed prices of that product sold indirectly to California purchasers.
11. **In Re Methionine Antitrust Litigation**, MDL 1311-class action alleging that certain manufacturers of methionine fixed prices to direct purchasers throughout the United States.

12. **In Re Methionine Cases**, JCCP 4090-class action alleging that certain manufacturers of methionine fixed prices to indirect purchasers of that product in California.
13. **Patco Enterprises, Inc., et al. V. Sunrise Carpet Industries, et al.**, SF Sup. St. Action No 980454-class action alleging that manufacturers of certain types of carpets fixed prices to indirect purchasers in California.
14. **In re Vitamin Antitrust Litigation**, JCCP 4076-statewide class action by indirect purchasers alleging a price-fixing conspiracy.
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17. **In re Compact Disc Minimum Advertised Price Antitrust Litigation**, United States District Court, District of Maine, MDL No. 1361-class action alleging price fixing on music compact discs.
18. **In re Laminate Cases**, Alameda Superior Court, Master File No. 304471-indirect purchaser class action alleging price fixing on high pressure laminates.
19. **Swiss American Sausage Co v. Pfizer, Inc.**, San Francisco Superior Court, No. 305121-indirect purchaser class action alleging price fixing on sodium erythorbate and maltol.
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21. **Behr Wood Sealant Cases**, San Joaquin Superior Court-indirect purchaser class action alleging defective wood sealant products.
22. **Panel Roofing**, Los Angeles Superior Court-class action alleging price fixing on panel roofing in the Los Angeles area.
23. **Cipro Cases**, San Diego Superior Court, JCCP 4154 and 4220-alleging unlawful agreement to eliminate generic Cipro from the market.

24. **Labelstock Cases**, San Francisco Superior Court, JCCP 4314, 4318 and 4326-indirect purchaser class action alleging price fixing on pressure sensitive labels.
25. **Credit/Debit Cart Typing Cases**, San Francisco Superior Court, JCCP 4335-alleging unlawful typing of debit cards to credit cards.
26. **Gustin Schreiner v. Crompton Corporation**, San Francisco Superior Court, No. CGC-04-429323-indirect purchaser class action alleging price fixing of NBR.
27. **Electrical Carbon Products Cases**, San Francisco Superior Court, JCCP 4294-indirect purchaser class action alleging price fixing on electrical carbon products.
28. **Polyester Staple Cases**, San Francisco Superior Court, JCCP 4278-indirect purchaser class action alleging price fixing on polyester staple.
29. **DRAM Cases**, San Francisco Superior Court, JCCP 4265 and U.S. District Court for the Northern District of California. -indirect purchaser class action alleging price fixing on DRAM.
30. **Environmental Technologies Cases**, Alameda Superior Court, JCCP 4257-indirect purchaser class action alleging price fixing on organic peroxide.
31. **Reidel v. Norfalco LLC**, San Francisco Superior Court, No. CGC-03-418080-indirect purchaser class action alleging price fixing of sulfuric acid.
32. **Villa v. Crompton Corporation**, San Francisco Superior Court, No. CGC-03-418080-indirect purchaser class action alleging price fixing of EPDM.
33. **Carbon Black Cases**, San Francisco Superior Court, JCCP No. 4324-indirect purchaser class action alleging price fixing of Carbon Black.
34. **Urethane Cases**, San Francisco Superior Court, JCCP No. 4367-indirect purchaser class action alleging price fixing of urethane.
35. **In Re Polychloroprene Antitrust Cases**, JCCP No. 4376, Los Angeles Superior Court-indirect purchaser class action alleging price fixing of polychloroprene rubber.
36. **The Harman Press et al., v. International Paper Co.** Master File No. CGC-04-432167, San Francisco Superior Court-indirect purchaser class action alleging price fixing of publication paper.

**37. California Indirect Purchaser MSG-Antitrust Cases.** Master File No. 3044471, San Francisco Superior Court. Indirect Purchaser class action alleging price fixing of Monosodium Glutamate.

**38. In Re: OSB Antitrust Litigation** Master File: No 06-CV-00826 (PSD) US District Court for the Eastern District of Pennsylvania . Indirect Purchaser class action alleging price fixing of Oriented Strand Board.

**39. IN RE; TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION.** MDL No. M-07-1827-SI. US District Court for the Northern District of California. Indirect Purchaser class action alleging price fixing of LCD Products, including Televisions, Computer Monitors and Laptops.

**40. In Re CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION.** MDL No. M-07-5944 SC. US District Court for the Northern District of California. Indirect Purchaser class action alleging price fixing of CRT Products, including Televisions and Computer Monitors.

LAUREN C. CAPURRO

*Curriculum Vitae*

Ms. Capurro is a 2002 graduate of the University Of Leeds, England with a Bachelor of Laws (LLB) with a specialization in European Law. Ms. Capurro also holds a D.E.U.G. Deux en Droit (2<sup>nd</sup> Year Diploma in Law) from L'Université Du Maine, Le Mans, France. She is also a 2004 graduate of the University Of California Hastings College of the Law with a Master of Laws (LLM) degree. While at U.C. Hastings, Ms. Capurro was the recipient of the CALI Academic Excellence Award and Witkin Award for Legal Research and Writing.

Ms. Capurro is admitted to practice before the State Bar of New York and the State Bar of California. She is also a qualified Solicitor admitted to practice before the courts of England and Wales. She is also admitted to practice before the United States Court of Appeals for the Ninth Circuit and several United States District Courts across the United States.

Upon graduation from law school, Ms. Capurro joined Trump, Alioto, Trump & Prescott, LLP working on complex civil litigation. Her practice focuses on state and federal antitrust, unfair competition and consumer protection class actions. During 10 years of practice in this area, Ms. Capurro has been involved in around 40 such cases. Ms. Capurro has significant experience representing plaintiffs in complex civil litigation, particularly antitrust class actions in federal court.

Ms. Capurro has played a lead role along with other members of Trump, Alioto, Trump & Prescott, LLP as sole lead counsel for the indirect purchaser plaintiffs in *In re Cathode Ray Tube (CRT) Antitrust Litigation*, 3:07-cv-5944-SC, pending before the Honorable Samuel Conti in the United States District Court for the Northern District of California. She also played a lead role as part of a four-firm co-lead counsel structure in the *In Re: Aftermarket Filters Antitrust Litigation*, 1:08-cv-4883-RWG, before the Honorable Robert W. Gettleman in the United States District Court for the Northern District of Illinois.

Ms. Capurro has been recognized by Northern California Super Lawyers as a Rising Star of Antitrust Law in 2012, 2013, 2014 and 2015.

Below is a list of representative complex litigation cases Ms. Capurro has been and is currently involved in.

**COMPLEX LITIGATION CASES**

- 1) *In re: Flat Glass Indirect Purchaser Antitrust Litigation*, JCCP 4033 - class action alleging that manufacturers of certain types of flat glass fixed prices to indirect purchasers in California.
- 2) *In re Laminate Cases*, Alameda Superior Court, Master File No. 304471—indirect purchaser class action alleging price fixing on high pressure laminates.
- 3) *Food Additives Cases*, Stanislaus Superior Court, JCCP 3261—indirect purchaser class action alleging price fixing on high fructose corn syrup.
- 4) *Cipro Cases*, San Diego Superior Court, JCCP 4154 and 4220—alleging unlawful agreement to eliminate generic Cipro from the market.
- 5) *Labelstock Cases*, San Francisco Superior Court, JCCP 4314, 4318 and 4326—indirect purchaser class action alleging price fixing on pressure sensitive labels.
- 6) *Credit/Debit Card Tying Cases*, San Francisco Superior Court, JCCP 4335—alleging unlawful tying of debit cards to credit cards.
- 7) *Gustin Schreiner v. Crompton Corporation*, San Francisco Superior Court, No. CGC-04-429323—indirect purchaser class action alleging price fixing of NBR.
- 8) *Electrical Carbon Products Cases*, San Francisco Superior Court, JCCP 4294—indirect purchaser class action alleging price fixing on electrical carbon products.
- 9) *Polyester Staple Cases*, San Francisco Superior Court, JCCP 4278—indirect purchaser class action alleging price fixing on polyester staple.
- 10) *DRAM Cases*, San Francisco Superior Court, JCCP 4265—indirect purchaser class action alleging price fixing on D-RAM.
- 11) *Environmental Technologies Cases*, Alameda Superior Court, JCCP 4257—indirect purchaser class action alleging price fixing on organic peroxide.
- 12) *Reidel v. Norfalco LLC*, San Francisco Superior Court, No. CGC-03-418080—indirect purchaser class action alleging price fixing of sulfuric acid.

- 13) *Villa v. Crompton Corporation*, San Francisco Superior Court, No. CGC-03-419116—indirect purchaser class action alleging price fixing of EPDM.
- 14) *Carbon Black Cases*, San Francisco Superior Court, JCCP 4323—indirect purchaser class action alleging price fixing of Carbon Black.
- 15) *Urethane Cases*, San Francisco Superior Court, JCCP 4367 -indirect purchaser class action alleging price fixing of urethane.
- 16) *In Re: California Polychloroprene Antitrust Cases*, Los Angeles Superior Court, JCCP 4376—indirect purchaser class action alleging price fixing of Polychloroprene rubber.
- 17) *California Indirect Purchaser MSG Antitrust Cases*, San Francisco Superior Court, Master File No. 304471—indirect purchaser class action alleging price fixing of monosodium glutamate (MSG).
- 18) *In re Dynamic Random Access Memory (DRAM) Antitrust Litigation*, United States District Court for the Northern District of California, MDL 1486—indirect purchaser multistate class action alleging price fixing of DRAM memory chips.
- 19) *In re: Urethane Antitrust Litigation*, United States District Court for the District of Kansas, MDL 1616—direct purchaser class action alleging price fixing of urethane chemicals.
- 20) *Brock v. Stolt Nielsen S.A. et al.*, San Francisco Superior Court, Case No. 429758—indirect purchaser class action alleging price fixing of shipping services.
- 21) *The Harman Press v. International Paper Co., et al.*, San Francisco Superior Court, Master File No. 432167—indirect purchaser class action alleging price fixing of publication paper.
- 22) *In re: Publication Paper Antitrust Litigation*, United States District Court for the District of Connecticut, MDL 1631—direct purchaser class action alleging price fixing of publication paper.
- 23) *In re: Hydrogen Peroxide Antitrust Litigation*, United States District Court for the Eastern District of Pennsylvania, Master File No. 2:05-cv-00666—indirect purchaser multistate class action alleging price fixing of hydrogen peroxide.



- 24) *In re OSB Antitrust Litigation*, United States District Court for the Eastern District of Pennsylvania, Master File No. 06-cv-00826—indirect purchaser multistate class action alleging price fixing of OSB.
- 25) *In re: Methyl Methacrylate (MMA) Antitrust Litigation*, United States District Court for the Eastern District of Pennsylvania, MDL 1768—indirect purchaser multistate class action alleging price fixing of Methyl Methacrylate (MMA).
- 26) *Miller, et al. v. Ajinomoto Company, Inc., et al.*, United States District Court for the Eastern District of Pennsylvania, Master File No. 2:06-cv-01862—indirect purchaser multistate class action alleging price fixing of Aspartame.
- 27) *Brooks, et al. v. Outokumpu Oyj, et al.*, United States District Court for the Western District of Tennessee, Master File No. 2:06-cv-02355—indirect purchaser multistate class action alleging price fixing of ACR Copper Tubing.
- 28) *In re Intel Corp. Microprocessor Antitrust Litigation*, United States District Court for the District of Delaware, MDL 1717—indirect purchaser multistate class action alleging monopolization by Intel of the United States microprocessor market.
- 29) *In re International Air Transportation Surcharge Antitrust Litigation*, United States District Court for the Northern District of California, MDL 1793—direct purchaser class action alleging price fixing of airline fuel surcharges on international flights.
- 30) *In re Static Random Access Memory (SRAM) Antitrust Litigation*, United States District Court for the Northern District of California, MDL 1819—indirect purchaser multistate class action alleging price fixing of SRAM memory chips.
- 31) *In re Graphics Processing Units Antitrust Litigation*, United States District Court for the Northern District of California, MDL 1826—direct purchaser class action alleging price fixing of Graphics Processing Units.
- 32) *In re: TFT-LCD (Flat Panel) Antitrust Litigation*, United States District Court for the Northern District of California, MDL 1827—direct purchaser class action alleging price fixing of TFT-LCDs or flat panels.
- 33) *In re Korean Airlines Passenger Antitrust Litigation*, United States District Court for the Central District of California, MDL 1891—direct purchaser class action alleging price fixing of passenger airline tickets on flights between the United States and South Korea.



- 34) *In re: LTL Shipping Antitrust Litigation*, United States District Court for the Northern District of Georgia, MDL 1895—indirect purchaser multistate class action alleging price fixing of fuel surcharges on “less than truckload” freight services.
- 35) *In re: Transpacific Passenger Air Transportation Antitrust Litigation*, MDL No. 1913—direct purchaser class action alleging price fixing of passenger airline tickets on flights containing at least one transpacific flight segment to or from the United States.
- 36) *In Re: Cathode Ray Tubes (CRT) Antitrust Litigation*, United States District Court for the Northern District of California, MDL No. 1917—indirect purchaser class action alleging price fixing of cathode ray tubes (CRTs) and products containing CRTs sold in the United States.
- 37) *In Re: Chocolate Confectionary Antitrust Litigation*, United States District Court for the Western District of Pennsylvania, MDL No. 1935—indirect purchaser class action alleging price fixing of chocolate confectionary products sold in the United States.
- 38) *In Re: Packaged Ice Antitrust Litigation*, United States District Court for the Eastern District of Michigan, MDL No. 1952—direct purchaser class action alleging price fixing of Packaged Ice sold in the United States.
- 39) *In Re: Aftermarket Filters Antitrust Litigation*, United States District Court for the Eastern District of Michigan, MDL 1957—indirect purchaser class action alleging price fixing of aftermarket automotive filters sold in the United States.
- 40) *In Re: Hawaiian and Guamanian Cabotage Antitrust Litigation*, United States District Court for the Western District of Washington, MDL No. 1972—direct purchaser class action alleging price fixing of domestic shipping services between the United States and Hawaii.
- 41) *In Re: Refrigerant Compressors Antitrust Litigation*, United States District Court for the Eastern District of Michigan, MDL No. 2042—indirect purchaser class action alleging price fixing of Hermetic Compressors sold in the United States.

# EXHIBIT 2

## TIME AND LODESTAR SUMMARY

[illegible]

## TIME AND LODESTAR SUMMARY

### INDIRECT PURCHASER PLAINTIFFS

[illegible]

## TIME AND LODESTAR SUMMARY

### INDIRECT PURCHASER PLAINTIFFS

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## TIME AND LODESTAR SUMMARY

### INDIRECT PURCHASER PLAINTIFFS

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## TIME AND LODESTAR SUMMARY

### INDIRECT PURCHASER PLAINTIFFS

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## TIME AND LODESTAR SUMMARY

### INDIRECT PURCHASER PLAINTIFFS

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## EXHIBIT 2

## IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

## TIME AND LODESTAR SUMMARY

## INDIRECT PURCHASER PLAINTIFFS

Firm Name	Trump, Alioto, Trump & Prescott LLP
Reporting Year	2013

Name/Status	Hourly Rate	1	2	3	4	5	6	7	8	9	10	11	12	Hours	Lodestar
Mario N. Alioto (P)	\$ 750.00	305.0	32.5	10.0		250.0	18.0	80.0	400.0	15.0	230.8	150.0		1491.3	\$ 1,118,437.50
Joseph M. Patane(OC)	\$ 725.00	49.8	14.3	3.0	7.5		38.3		53.3	8.3	28.0	104.5		306.8	\$ 222,393.75
Lauren C. Capurro (A)	\$ 550.00	33.75	34.25		73.25	525.5	206.75	174.5	38.75	79.75	568	63.25	3.0	1800.8	\$ 990,412.50
David Denison(A)	\$ 400.00							884.8						884.8	\$ 353,900.00
Bomsu Park (A)	\$ 375.00							274.0						274.0	\$ 102,750.00
Kelly Patane (A)	\$ 275.00							133.0						133.0	\$ 36,575.00
Kelly Patane(LC)	\$ 250.00							559.0						559.0	\$ 139,750.00
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		388.5	81.0	13.0	80.8	775.5	263.0	2105.3	492.0	103.0	826.8	317.8	3.0	5449.5	\$ 2,964,218.75

## TIME AND LODESTAR SUMMARY

### INDIRECT PURCHASER PLAINTIFFS

[illegible]

## TIME AND LODESTAR SUMMARY

### INDIRECT PURCHASER PLAINTIFFS

[illegible]



# EXHIBIT 3

## Expense Summary

<b>Firm Name</b>	<b>Trump Alioto Trump &amp; Prescott, LLP</b>		
<b>Reporting Year</b>	<b>Inception through Present</b>		
<b>TYPE OF EXPENSE</b>			<b>TOTAL</b>
Assessments		\$	1,260,000.00
Outside Copies			
In-house Reproduction /Copies		\$	4,267.15
Court Costs & Filing Fees		\$	1,140.00
Court Reporters / Transcripts			
Computer Research		\$	3,554.48
Telephone & Facsimile		\$	3,431.23
Postage/Express Delivery/Courier		\$	1,062.15
Professional Fees (investigator, accountant, etc.)			
Experts			
Witness / Service Fees		\$	500.00
Travel: Airfare		\$	2,429.71
Travel: Lodging/Meals		\$	3,917.58
Travel: Other		\$	28.00
Car Rental/Cabfare/Parking		\$	3,011.15
Other Expenses		\$	2,256.00
		\$	1,285,597.45